

RECORD OF COMMUNICATION	Phone Call	Conference X	Date: 4/26/12
	Discussion	Other FAX	Time:
<b>TO:</b> The File for the UEC Goliad Co. Aquifer Exemption Phone: 361 – 645-1716			
<b>FROM:</b> Ray Leissner, EPA Region 6 Phone: 214-665-7183			

RE: The effort to examine our justification for modeling

Region 6 management, in order to examine UEC's claims that Region 6's request for modeling represents an unjustified and unprecedented action, requested a review of all previous exemptions granted in Texas.

Our request for modeling was based on two findings. Region 6 has been made aware by oversight and citizen's complaints that restoration at ISL sites have no record of being fully successful. Residuals, at levels potentially harmful to persons, may exist in the restored aquifer after closure and may migrate. Secondly, a plat map provided in the Goliad application indicates relatively extensive use of the aquifer through private wells surrounding and within ¼ mile of the proposed facility. The presence of these water source wells in such proximity and number raised questions as to the ability of the exemption to meet the first criteria and be protective of human health by ensuring that any residuals, above harmful levels, would remain in the exempted zone .

To demonstrate the unique circumstances of the Goliad exemption that warrant the request for modeling, the staff pulled together records from two sources. The staff utilized a spreadsheet that was previously produced from all existing exemption files to contribute to a national data base and pulled together areal photographs of each site from the internet. The photos were dated as close to the approval date as possible, to reflect the proximity of human habitation with ¼ mile of the exemptions at the time of their evaluations. Together these two sources were sufficient to demonstrate to management that the concentration of human habitation existing around the Goliad site was unique compared to previous applications and justifies increased scrutiny.